

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of Telecommunications)
and Energy to establish a surcharge to recover prudently)
incurred costs associated with the provision of wireline)
Enhanced 911 services, relay services for TDD/TTY users,)
communications equipment distribution for people with)
disabilities, and amplified handsets at pay telephones.)

D.T.E. 03-63

**PETITION TO INTERVENE
OF VERIZON MASSACHUSETTS**

Pursuant to 220 C.M.R.1.03(1) of the Rules of Practice and Procedure of the Department of Telecommunications and Energy ("Department"), Verizon Massachusetts ("Verizon MA") hereby petitions the Department for leave to intervene as a party in this proceeding. As grounds for its Petition, Verizon MA states as follows:

1. Verizon MA is a common carrier offering intraLATA telecommunications services, including exchange and exchange access services, in the Commonwealth of Massachusetts. The Company's business address is 185 Franklin Street, Boston, Massachusetts 02110.

2. In its *Notice of Investigation* issued on May 29, 2003, the Department opened this investigation into the establishment of a surcharge to recover prudently incurred costs associated with the provision of wireline Enhanced 911 services, relay services for TDD/TTY users, communications equipment distribution for people with disabilities, and amplified handsets at pay telephones. That surcharge will appear on retail customers' telephone bills. The Department

establishes the surcharge pursuant to Chapter 239 of the Acts of 2002, Massachusetts General Laws c. 159, § 12(d), and proposed regulations (220 C.M.R. §§ 16.00 et seq.) in D.T.E. 03-24.

3. Since this investigation will address the surcharge to be levied on Verizon MA's retails customers for recovery of costs incurred by Verizon MA in the provision of E911 and relay services, Verizon MA is substantially and specifically affected by the proceeding. Verizon MA's interests cannot be adequately represented without the Department granting this petition.

4. Verizon MA intends to participate fully in the case and will, as necessary, present analyses, testimony, conduct discovery, cross-examine witness, and file briefs to protect its interests.

5. All correspondence and other communications regarding this proceeding should be served on counsel for Verizon MA. In addition, Verizon MA requests that all materials in the case also be served on the following:

Barbara Landry, Specialist
Verizon
125 High Street, 11th Floor
Boston, MA 02110
e-mail: barbara.landry@verizon.com

WHEREFORE, Verizon MA requests leave to intervene in the proceeding with all the rights of participation as a full party.

Respectfully submitted,

VERIZON MASSACHUSETTS

Its Attorney,

Barbara Anne Sousa
185 Franklin Street, 13th Floor
Boston, Massachusetts 02110-1585
(617) 743-7331

Dated: June 12, 2003